



*Consulting Engineers
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March 11, 2010
(PBW Project No. 1352)

VIA COURIER

Mr. Gary Miller
Remedial Project Manager
U.S. Environmental Protection Agency, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Ms. Barbara Nann
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 6
Superfund Division (6RC-S)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

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SUPERFUND DIV.
REMEDIAL BRANCH
(6SF-RA)

**RE: FINAL SCREENING-LEVEL ECOLOGICAL RISK ASSESSMENT
GULFCO MARINE MAINTENANCE SUPERFUND SITE
FREEPORT, TEXAS**

Dear Mr. Miller and Ms. Nann:

Please find enclosed three (3) copies (Mr. Miller) and one copy (Ms. Nann) of the Final Screening-Level Ecological Risk Assessment (SLERA) for the Gulfco Marine Maintenance Superfund Site. This report incorporates comments on the Revised Updated SLERA dated December 22, 2009 as provided in your letter dated February 24, 2010. A summary of the February 24, 2010 comments and corresponding responses explaining how each comment was addressed is provided in Attachment A to this letter. A redline-strikeout version of the revised report text (generated through the Microsoft Word® "Compare Documents" feature) is provided in Attachment B to this letter.

As specified in the comments attached to Mr. Miller's February 24, 2010 letter and subsequently confirmed by a February 26, 2010 e-mail, the following additional ecological risk assessment documents are included with this transmittal:

- Draft Baseline Ecological Risk Assessment (BERA) Problem Formulation; and
- Draft BERA Work Plan & Sampling and Analysis Plan.

These documents are submitted as draft versions for your review and comment. Final versions will be prepared following receipt of your review comments.

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Mr. Gary Miller and Ms. Barbara Nann
March 11, 2010
Page 2

The enclosed documents were prepared by Pastor, Behling & Wheeler, LLC (PBW) on behalf of LDL Coastal Limited LP (LDL), Chromalloy American Corporation (Chromalloy) and The Dow Chemical Company (Dow). In accordance with Paragraph 52 of the amended Unilateral Administrative Order for the Site, effective January 31, 2008 (the amended UAO), I certify that I have been fully authorized by these Respondents to submit these documents and to legally bind these Respondents thereto.

Paragraph 13 of the Statement of Work attached to the amended UAO requires an electronic copy of project deliverables be provided in WordPerfect® format. However, as requested by Mr. Miller for previous project deliverables, electronic copies of the text of the enclosed documents are provided in Microsoft Word® format and the other document components are provided in Adobe® format instead. Three separate DVDs with these electronic files (one for each of the documents) are transmitted herewith to Mr. Miller.

In a telephone conversation with Mr. Miller on February 26, 2010, we expressed our belief that the Gulfco RI/FS would be best served by submittal of the Draft BERA Problem Formulation and Draft Work Plan & SAP in sequential fashion following EPA approval of the Final SLERA. We noted that such a sequential submittal is consistent with the step-by-step process described in both the amended UAO and EPA's ecological risk assessment guidance. Nevertheless, we are providing all three documents with this submittal in accordance with your instructions.

We respectfully suggest that, consistent with EPA guidance and as mentioned in our January 6, 2010 meeting, a meeting be held between agency and GRG ecological risk assessment representatives to facilitate completion of problem formulation and scoping of ecological investigation activities. We propose that meeting be held as EPA is completing, but prior to the completion of, its review of the enclosed Draft Problem Formulation report and the Draft Work Plan & SAP. We believe such a meeting would be beneficial, particularly with regard to developing the final problem formulation scientific/management decision point (SMDP), and confirming a common understanding of the ecological investigation objectives, scope and data evaluation procedures.

Thank you for the opportunity to submit these documents. Should you have any questions, please do not hesitate to contact me at any time.

Sincerely,

PASTOR, BEHLING & WHEELER, LLC

A handwritten signature in black ink, appearing to read 'Eric F. Pastor', is written over the typed name.

Eric F. Pastor, P.E.
Principal Engineer

Enclosures

Mr. Gary Miller and Ms. Barbara Nann
March 11, 2010
Page 3

cc: Ms. Luda Voskov – Texas Commission on Environmental Quality (2 copies)
Mr. Doug McReynolds – EA Engineering, Science and Technology
Ms. Jessica White – National Oceanic and Atmospheric Administration
Mr. Ron Brinkley – US Fish and Wildlife Service
Mr. Don Pitts – Texas Parks and Wildlife Department
Mr. Andy Tirpak – Texas Parks and Wildlife Department
Mr. Tommy Mobley – Texas General Land Office
Mr. John Wilder – Texas Commission on Environmental Quality
Mr. Larry Champagne - Texas Commission on Environmental Quality